

STATE OF CONNECTICUT
CONNECTICUT SITING COUNCIL

IN RE: :
 :
APPLICATION OF THE TOWERS, LLC FOR A : DOCKET NO. 535
CERTIFICATE OF ENVIRONMENTAL :
COMPATIBILITY AND PUBLIC NEED FOR :
THE CONSTRUCTION, MAINTENANCE AND :
OPERATION OF A WIRELESS :
TELECOMMUNICATIONS FACILITY AT 835 :
NORWICH WORCESTER TURNPIKE (ROUTE :
169), WOODSTOCK, CONNECTICUT : SEPTEMBER 8, 2025

**APPLICANT’S OBJECTION TO INTERVENOR’S MOTION TO CONTINUE/RESET
HEARING DATE**

The Towers LLC (the “Applicant”) objects to the Motion to Continue/Reset the Docket No. 535 Hearing Date, filed by Paska Nayden (the “Intervenor”) on September 4, 2025.

Background

The Applicant proposes the construction maintenance and operation of a telecommunications facility at 835 Route 169 in Woodstock Connecticut. The Connecticut Siting Council (“Council”) process commenced with the submission of Technical Information to Woodstock Town officials on December 4, 2024. On February 20, 2025, the Woodstock Planning and Zoning Commission (“PZC”) hosted a Public Information Meeting (“PIM”) on the tower proposal. The application for a Certificate of Environmental Compatibility and Public Need (the “Application”) was filed with the Council on April 7, 2025. The Council’s schedule established a deadline for the exchange of Parties and Intervenor interrogatories of July 17, 2025, and a deadline for the submission of pre-filed testimony and interrogatory responses of July 24, 2025. The evidentiary and public hearings in this docket commenced on July 31, 2025.

Notwithstanding the lengthy pre-application and Application processes, mere hours before the commencement of the evidentiary hearing, the Intervenor, ignoring the Council's established docket schedule, filed an Intervenor Status Request Form with the Council. Over the objection of the Applicant, the Council granted the Intervenor's request. The Intervenor was permitted to participate in the July 31, 2025 evidentiary hearing and cross examined the Applicant's witness panel. Although it was not required to do so, the Council then agreed to continue the Docket No. 535 evidentiary hearing and provided the Intervenor with the opportunity to submit additional evidence, pre-filed testimony, and interrogatories. The Intervenor's issued interrogatories to the Applicant and submitted Pre-filed Testimony with the Council on August 26, 2025. The Applicant responded to the Intervenor's interrogatories on September 2, 2025, in accordance with the Council's revised docket schedule.

On September 4, 2025, the Intervenor filed three (3) additional, somewhat repetitive, motions with the Council, seeking (1) administrative relief from the Council's "filing requirements; (2) a "Motion to Continue/Reset" Hearing Date (Good Cause); and (3) an Alternative Motion: Keep Record Open, Accept Supplementals and Allow Remote Participation". This objection relates specifically to the Intervenor's Motion to Continue/Reset Hearing Date.

Motion to Continue/Reset the Evidentiary Hearing

The Intervenor's September 4, 2025, "Motion Continue/Reset Hearing Date" cites three specific reasons for the request.

1. The Intervenor requested administrative relief and accommodation from the Council, regarding the acceptance of PDF documents in lieu of the "original" documents and the requirement for the hand-delivery fifteen (15) copies of said documents. On September

4, 2025, the Applicant notified the Council that it did not object to this request and the Intervenor's request for relief was granted on September 5, 2025.

Objection: The Council's action on September 5, 2025 renders this request moot.

2. The Intervenor requests a "brief continuance" of the evidentiary hearing to allow the Applicant time to respond to the Intervenor's "targeted, non-duplicative add-on interrogatories".

Objection: As stated above, on September 2, 2025, the Applicant filed its responses to the Intervenor's interrogatories. Additional time to do so is, therefore, not required. The Applicant's timely response to the Intervenor's interrogatories renders this request moot.

3. The Intervenor requests a "short continuance (7-14 days)" of the proceeding to allow for the production of documents consistent with the Council recyclable paper requirements.

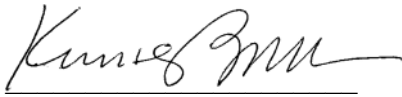
Objection: If the Intervenor's request relates to the documents referenced in paragraph No.1 above, there is no need for a continuance as the Council has already provided Ms. Nayden with the relief requested. If the request relates to additional pre-filed documents and testimony, the deadline for submission of that information, according to the Docket No. 535 Revised Schedule was September 2, 2025. That deadline has passed, and no further evidence or testimony may be submitted.

Conclusion

The Council has taken, by all accounts, more than reasonable steps to accommodate the Intervenor's untimely requests to participate in this proceeding. Ms. Nayden stated, in her intervenor request form, that her participation would not cause delay or disrupt the orderly conduct of the hearing. Her actions, since being granted intervenor status, suggest otherwise. Ms. Nayden was given the opportunity to cross examine the Applicant's witnesses on July 31,

2025. Ms. Nayden filed written testimony with the Council and issued interrogatories to the Applicant on August 26, 2025. Ms. Nayden received responses to her interrogatories on September 2, 2025. Ms. Nayden will be given the opportunity to present her affirmative case to the Council and the Applicant on September 9, 2025. Absent some extraordinary event, it is the Applicant's position that there is no reason for the Council's evidentiary hearing to be continued beyond the September 9, 2025.

Respectfully submitted,
THE TOWERS, LLC

By: 

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CERTIFICATION OF SERVICE

I hereby certify that a copy of the forgoing was sent electronically to the following:

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September 8, 2025

Date



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